DRAFT/PROPOSED

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **July 15, 2021**

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

THROUGH: Phil Martin, P.E., Engineering Manager, Existing Source Permit Section

THROUGH: Joseph K. Wills, P.E., Engineering Section

FROM: Morgan McGrath, P.E., Engineering Section, ROAT

SUBJECT: Evaluation of Permit Application No. **2020-0213-TVR2**
Rose Rock Midstream, LP
Cushing North Tank Farm (SIC 4612/NAICS 486110)
AQD Facility ID: 7238
Latitude 36.01604°N, Longitude 96.75876°W
Section 22, Township 18N, Range 5E, Payne County, OK
Directions: From the intersection of Hwy 33 and Hwy 18, go north 2.3 miles on Hwy 18 and then east on E. Deep Rock Rd. (E0690 Rd.) approximately 0.5 east to facility entrance on the north.

SECTION I. INTRODUCTION

Rose Rock Midstream, LP (Rose Rock or applicant) has submitted an application for renewal of the Part 70 operating permit for their Cushing North Tank Farm. The facility is currently operating under Permit No. 2014-2368-TVR (M-1) issued on May 22, 2017, and Permit No. 2014-2368-C (M-2) issued on August 10, 2020.

The facility is a major source for Prevention of Significant Deterioration (PSD). The facility is considered an area source of Hazardous Air Pollutants (HAPs).

SECTION II. PROCESS DESCRIPTION

The Rose Rock Cushing North Tank Farm (Facility) is a crude oil storage and transmission facility located in the town of Cushing, OK, in Payne County. This is an existing facility that is currently permitted for a variety of condensate/crude oil storage tanks, an unloading station, and the associated piping and equipment.

Condensate/crude oil is received by tank truck or via pipeline. If the liquid is received via tank truck, it is typically pumped into a smaller tank (i.e., 400-bbl fixed roof tank or 1,000-bbl internal floating roof tank) before it is transferred to one of the larger external floating roof (EFR) storage tanks. As required, the liquid is then transferred out of the facility via pipeline.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
2014-2368-TVR	*10/9/2015*	*1st Title V Renewal*
2014-2368-TVR (M-1)	*05/22/2017*	*Minor Modification to include two (2) additional 1,000-bbl internal floating roof tanks*
2014-2368-TVR (M-2)	*08/20/2020*	*Rose Rock requested to add three (3) 30-hp propane-fired emergency generators to provide backup electrical power, which have been reviewed in Permit No. 2014-2368-C (M-2). The four emergency generators are reviewed as one project to determine PSD applicability. Administrative amendment was done to incorporate 2014-2368-C (M-2) into 2014-2368-TVR (M-2).*
2014-2368-C (M-2)	*08/21/2020*	*Significant Modification to accomplish the following:* *1. Adding roof landing events to accommodate 10-year DOT inspections, and providing a PSD netting analysis for existing tanks;* *2. Updating the emission factors for fugitive emissions to the Marketing Terminal Average Emission Factors (EPA-453/R-95-017 Table2-3), instead of Oil and Gas Production Operations (Table 2-4);* 3. *Adding one (1) additional 30-hp propane-fired emergency generator. Rose Rock requested to add another three (3) 30-hp emergency generators in permit application 2014-2368-TVR (M-2) to provide backup electrical power. The four emergency generators were reviewed together in this permit action.*

SECTION IV. REQUESTED CHANGES

The renewal application indicates no requests or changes by the applicant. AQD has also taken the opportunity in the renewal to update all federal and state regulations that apply to the facility.

Due to EPA's recent termination of support to TANKS 4.0.9d, AQD has begun implementing a policy in order to update calculations of emissions using a supported methodology. Per AQD policy, Rose Rock was required to update tank breathing and working losses with this renewal application. Applicant has submitted revised emission calculations for EUG 3, EUG 4, and EUG 4a using Section 7.1 of AP-42 (06/20). While the permit limits assigned in the specific conditions remain unchanged for all EUGs, as a result of the revised calculations and methodology, the previous compliance demonstration for EUG 4 and EUG 4a was determined to be no a longer valid compliance demonstration. Specifically, the previous compliance demonstration for those units was to not exceed a throughput limit. That assumption was no longer valid for the revised methodology. Therefore, a revised compliance demonstration has been added to EUG 4 and EUG 4a. The compliance demonstration requires that emissions from each tank to be calculated each month based on the TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20).

Compliance with each emission limit is specified to be determined on a monthly, 12-month rolling total basis.

SECTION V. EQUIPMENT

Emission units are organized into emission unit groups (EUGs) as shown below.

EUG 2 – Fugitives			
EU ID	**Point ID**	**Source**	**# Items**
F1	F1	Pump seals – light oil	10
F2	F2	Valves – light oil	297
F3	F3	Flanges – light oil	964
F4	F4	Other	168
F5	F5	Loading boxes	6

EUG 3 – Storage Tanks					
EU ID	**Point ID**	**Roof Type**	**Capacity (bbl)**	**Throughput (bbl/tank/yr)**	**Construction/Installation Date**
T-1007	1007	EFR	100,000	9,200,000	2009
T-1009	1009	EFR	100,000	2,400,000	2011
T-1010	1010	EFR	100,000	2,400,000	2012
T-1011	1011	EFR	100,000	2,400,000	2012
T-1012	1012	EFR	100,000	2,400,000	2012
T-2522	2522	EFR	250,000	23,000,000	2009
T-2523	2523	EFR	250,000	23,000,000	2009
T-2524	2524	EFR	250,000	23,000,000	2009
T-2525	2525	EFR	250,000	23,000,000	2009
T-2526	2526	EFR	250,000	23,000,000	2011
T-2527	2527	EFR	250,000	23,000,000	2012
T-2528	2528	EFR	250,000	23,000,000	2012
T-2529	2529	EFR	250,000	23,000,000	2012
T-2530	2530	EFR	250,000	14,600,000	2009
T-2531	2531	EFR	250,000	23,000,000	2009
T-2532	2532	EFR	250,000	23,000,000	2009
T-2533	2533	EFR	250,000	23,000,000	2010
T-2534	2534	EFR	250,000	23,000,000	2011
T-2535	2535	EFR	250,000	6,000,000	2012
T-2536	2536	EFR	250,000	6,000,000	2012
T-2537	2537	EFR	250,000	6,000,000	2012
T-2538	2538	EFR	250,000	6,000,000	2011
T-2539	2539	EFR	250,000	6,000,000	2012
T-2540	2540	EFR	250,000	6,000,000	2012
T-2541	2541	EFR	250,000	6,000,000	2012
T-3501	3501	EFR	350,000	32,200,000	2009
T-3502	3502	EFR	350,000	32,200,000	2009

EUG 3 – Storage Tanks					
EU ID	**Point ID**	**Roof Type**	**Capacity (bbl)**	**Throughput (bbl/tank/yr)**	**Construction/Installation Date**
T-3503	3503	EFR	350,000	32,200,000	2009
T-3504	3504	EFR	350,000	32,200,000	2009
T-3505	3505	EFR	350,000	32,200,000	2009
T-3506	3506	EFR	350,000	32,200,000	2009

EUG 4 – Storage Tanks – Cone Roof					
EU ID	**Point ID**	**Roof Type**	**Capacity (bbl)**	**Throughput (bbl/tank/yr)**	**Construction/Installation Date**
T-403	403	Cone	400	200,000	2010
T-404	404	Cone	400	200,000	2010

EUG 4A – Truck Unloading Tanks – IFR					
EU ID	**Point ID**	**Roof Type**	**Capacity (bbl)**	**Throughput (bbl/tank/yr)**	**Construction/Installation Date**
T-101	101	IFR	1,000	1,095,000	2015
T-102	102	IFR	1,000	1,095,000	2015

Roof landings are being placed as a separate EUG from the tanks primarily for administrative convenience in tracking additional emissions from these events, rather than attempting to add emissions to individual tanks.

	EUG 5 – Roof Landings			
EU ID	**Tank Size (bbl)**	**Number of Tanks**	**Events Per Year**	**Construction / Installation Date**
EUG-3 tanks	100K	5	2	See EUG-3
EUG-3 tanks	250K	20	13	
EUG-3 tanks	350K	6	2	
EUG-4A tanks	1K	2	1	See EUG-4A

EUG 6 - Emergency Generators					
EU	**Make/Model**	**HP**	**Fuel**	**Manufacture Date**	**Serial #**
6-1	Generac Model 7042 – Tech Shop	30	Propane	12/19/17	3002486406
6-2	Generac Model 7042 – Office	30		10/6/16	3001144241
6-3	Generac Model 7042 –Maintenance Shop	30		4/29/19	3004537380
6-4	Generac Model 7042 – Operations Building	30		10/6/16	3001144075

SECTION VI. EMISSIONS

- Fugitive VOC emission were calculated emission factors from EPA's *"Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017),* Table 2.3 – Marketing Terminal Emission Factors, an estimated number of actual fugitive components, and 100% C3+. Marketing terminal factors are more representative for this facility because it is continuously manned (i.e., daily inspections) and handles crude/condensate liquids at low pipeline pressures (less than 50 psia) only. The table below details fugitive emission estimates.

Fugitive Emissions

EU ID	Emission Factor (lb/hr/component)	# Items	VOC Emissions
			TPY
Pump Seals	0.001188	10	0.05
Valves	0.0000946	297	0.12
Flanges	0.0000176	964	0.07
Other (Packing seals, drip pans, sumps)	0.000286	168	0.21
Total			**0.46**

- The only emissions of consequence from the storage tanks are VOCs and HAPs contained therein from breathing and working losses. Emissions estimates were based on the listed maximum throughput for each tank in EUG 3 and AP-42 (06/20) Section 7.1. Fuel properties indicate a RVP of 9 psia, a stock tank bulk temperature of 61.81°F, and Figure 7.1-13a from AP-42 (06/20) Section 7.1 to estimate a stock true vapor pressure of the liquid.

EUG 3 - EFR			
EU ID	Throughput, bbl/yr	VOC Emissions	
		lb/hr	TPY
T-1007	9,200,000	---	2.68
T-1009	2,400,000	---	1.43
T-1010	2,400,000	---	1.43
T-1011	2,400,000	---	1.43
T-1012	2,400,000	---	1.43
T-2522	23,000,000	---	4.22
T-2523	23,000,000	---	4.22
T-2524	23,000,000	---	4.22
T-2525	23,000,000	---	4.22
T-2526	23,000,000	---	4.22
T-2527	23,000,000	---	4.22
T-2528	23,000,000	---	4.22
T-2529	23,000,000	---	4.22
T-2530	14,600,000	---	4.22
T-2531	23,000,000	---	4.22

EUG 3 - EFR			
EU ID	**Throughput, bbl/yr**	**VOC Emissions**	
		lb/hr	**TPY**
T-2532	23,000,000	---	4.22
T-2533	23,000,000	---	4.22
T-2534	23,000,000	---	4.22
T-2535	6,000,000	---	2.46
T-2536	6,000,000	---	2.46
T-2537	6,000,000	---	2.46
T-2538	6,000,000	---	2.46
T-2539	6,000,000	---	2.46
T-2540	6,000,000	---	2.46
T-2541	6,000,000	---	2.46
T-3501	32,200,000	---	5.32
T-3502	32,200,000	---	5.32
T-3503	32,200,000	---	5.32
T-3504	32,200,000	---	5.32
T-3505	32,200,000	---	5.32
T-3506	32,200,000	---	5.32
Potential to Emit			**112.4 (1)**
Permit Limits			**99.65**

(1) The VOC total is representative of the maximum emissions of all contributing emission units. However, EUG 3 is permitted to operate under a EUG 3 CAP for VOC of 99.65 TPY.

For the fixed roof tanks in EUG 4, emissions are based on a throughput of 200,000-bbl/yr-tank and AP-42 (06/20) Section 7.1. Fuel properties indicate a RVP of 5 psia, a stock tank bulk temperature of 61.81°F, and Figure 7.1-13a from AP-42 (06/20) Section 7.1 to estimate a stock true vapor pressure of the liquid.

EUG 4 - FR			
EU ID	**Throughput, bbl/yr**	**VOC Emissions**	
		lb/hr	**TPY**
T-403	200,000	---	2.58(1)
T-404	200,000	---	2.58(1)

(1) The VOC total is representative of the maximum emissions of each tank. However, each tank will retain its existing VOC permit limit of 1.52 TPY (per tank). The permit requires compliance with the emissions limits to be determined on a monthly, 12-month rolling total basis. Emissions from each tank would then be calculated each month based on the actual TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20).

For the truck unloading tanks in EUG 4A, emissions are based on a throughput of 1,095,000-bbl/yr and AP-42 (06/20) Section 7.1. Fuel properties indicate a RVP of 9 psia, a stock tank bulk temperature of 61.81°F, and Figure 7.1-13a from AP-42 (06/20) Section 7.1 to estimate a stock true vapor pressure of the liquid.

EUG 4A - IFR			
EU ID	**Throughput, bbl/yr**	**VOC Emissions**	
		lb/hr	**TPY**
T-101	1,095,000	---	2.09 (1)
T-102	1,095,000	---	2.09 (1)

(1) The VOC total is representative of the maximum emissions of each tank. However, each tank will retain its existing VOC permit limit of 1.78 TPY (per tank). The permit requires compliance with the emissions limits to be determined on a monthly, 12-month rolling total basis. Emissions from each tank would then be calculated each month based on the actual TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20).

- Roof landing loss emissions were based on equations obtained from AP-42 (06/20) Section 7.1 and crude oil of RVP 7. All landing emissions are limited under a cap of 44.5 TPY.

EUG 5 – Roof Landings					
EU ID	**Tank Size (bbl)**	**Number of Tanks**	**Event Emissions (ton)**	**Events Per Year**	**Total Landing Emissions (TPY)**
EUG-3 tanks	100K	5	1.03	2	2.05
EUG-3 tanks	250K	20	2.68	13	34.88
EUG-3 tanks	350K	6	3.76	2	7.51
EUG-4A tanks	1K	2	0.018	1	0.04
Total					**44.48**

- Emissions from the 30-hp (355,000 BTUH) Generac Model 7042 emergency generators were calculated based on 500 hours/yr total operation and emission factors based on EPA Tier 3, nonroad requirements (HC + NOx standard divided into separate NOx and VOC standards). Formaldehyde emission factor is obtained from AP-42 (7/00) Table 3.2-3.

Emergency Generator Emission Factors

EU ID	NO_X (g/hp-hr)	CO (g/hp-hr)	VOC[1] (g/hp-hr)	CH_2O (lb/MMBtu)
6-1 thru 6-4	6.5	387	3.5	0.0205

[1] Since the NSPS Subpart JJJJ emission limit for VOC does not include H_2CO, H_2CO is added to the VOC emissions shown in the facility-wide emissions summary to represent total VOC.

Engine Emissions

EU ID	NO_X		CO		VOC		H_2CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
6-1	0.43	0.11	25.60	6.40	0.23	0.058	0.007	0.002
6-2	0.43	0.11	25.60	6.40	0.23	0.058	0.007	0.002
6-3	0.43	0.11	25.60	6.40	0.23	0.058	0.007	0.002
6-4	0.43	0.11	25.60	6.40	0.23	0.058	0.007	0.002

Facility-Wide Emission Summary

Criteria Pollutant Emission Summary

EUG	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
2	--	--	--	--	--	0.46
3	--	--	--	--	--	99.65 [1]
4	--	--	--	--	--	3.04 [2]
4A	--	--	--	--	--	3.56 [3]
5	--	--	--	--	--	44.50
6	1.72	0.43	102.38	25.60	0.95[4]	0.24[4]
Total	**1.72**	**0.43**	**102.38**	**25.60**	**0.95**	**151.43**

[1] EUG 3 is permitted to operate under a EUG 3 CAP for VOC of 99.65 TPY.

[2] Each tank will retain its existing VOC permit limit of 1.52 TPY (per tank). The permit requires compliance with the emissions limits to be determined on a monthly, 12-month rolling total basis. Emissions from each tank would then be calculated each month based on the actual TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20).

[3] Each tank will retain its existing VOC permit limit of 1.78 TPY (per tank). The permit requires compliance with the emissions limits to be determined on a monthly, 12-month rolling total basis. Emissions from each tank would then be calculated each month based on the actual TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20).

[4] Since the NSPS Subpart JJJJ emission limit for VOC does not include H_2CO, H_2CO is added to the VOC emissions shown in the facility-wide emissions summary to represent total VOC.

Speciated HAPs emitted from the tanks are listed in the following table. HAPs from EUG 3, EUG 4, and EUG 4a are estimated using the same methodology as listed for their associated VOC emissions and then multiplied by the expected maximum weight % of HAP (Hexane 0.40%, Benzene 0.60%, Toluene 1.00%, Xylene 1.40%, and Ethyl Benzene 0.40%). Total HAPs from EUG 3, EUG 4, and EUG 4a are estimated to be 4.62 TPY with highest individual HAP being Xylene (1.70 TPY). H_2S will be emitted from the EFR tanks. H_2S emissions were estimated based on the crude oil having a maximum of 5% sulfur and assuming 10% of the sulfur existed as H_2S, or 0.5% of total vapor emitted. Then, 0.5% of 151.42 TPY = 0.77 TPY.

Hazardous Air Pollutant Emission Summary

HAP	Emissions, TPY
Benzene	1.22
Ethylbenzene	
Hexane	0.49
Isopropyl benzene	0.12
Toluene	1.19
Xylene	1.70
Isooctane	0.21
Formaldehyde	0.01
Total	**4.94**

Since the individual HAP does not exceed 10 TPY and combined HAP is less than 25 TPY, the facility is considered an area source of HAP emissions.

SECTION VII. INSIGNIFICANT ACTIVITIES

No insignificant activities were identified in the application.

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in "attainment" of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years as required.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
This facility meets the definition of a major source since it has the potential to emit regulated pollutants in excess of 100 TPY. As such, a Part 70 construction permit is required. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the operating permit application, previous issued permits, or are developed from the applicable requirement.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of

an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBtu for all equipment at this facility with a heat input rating of 10 MMBtu/hr or less. The four emergency generators are subject to the requirements of this section. However, the use of propane as fuel will not result in generator PM emissions that would approach the 0.60 lbs/MMBtu limitation.

This subchapter also limits emissions of PM from industrial processes. Since there are no significant particulate emissions from the nonfuel-burning processes at the facility compliance with the standard is assured without any special monitoring provisions.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
This subchapter states that no person shall allow the discharge of any fumes, aerosol, mist, gas, smoke, vapor, particulate matter, or any combination thereof exhibiting greater than 20% opacity except for short term occurrences, which consist of not more than one six-minute (6) period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24-hour period. In no case shall the average of any six-minute (6) period exceed 60% opacity. Since there are no significant fuel-burning or PM-producing activities, compliance is assured.

OAC 252: 100-29 (Fugitive Dust) [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area; therefore, it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits ambient air concentration impacts of H_2S to 0.2 ppm (24-hour average). The applicant has indicated that the majority of the crude stored at the tank farm is of the "sweet" variety (i.e., negligible-to-very low sulfur content, < 0.5%). Occasionally, the applicant will store "sour" crude in an external floating roof tank (EFR ASTs) that was then blended with sweet crude. The applicant

used AERSCREEN modeling to demonstrate that the ambient concentration would not be exceeded. The facility was modeled as an area source. The calculated 1-hr average concentration is 154 $\mu g/m^3$. This impact is in compliance with the limit of 0.2 ppm (283 $\mu g/m^3$), 24-hour average.
Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). The emergency generators use commercial propane. The AP-42 (7/00) Table 3.2-3 emission factor of 0.00058 lbs/MMBtu is well below the new equipment standard of 0.2 lbs/MMBtu for gaseous fuels in this subchapter.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
This subchapter limits NO_X emissions from new fuel-burning equipment with a rated heat input greater than or equal to 50 MMBtu/hr. There is no fuel-burning equipment on location.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity between 400 and 40,000 gallons and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The 400-bbl tanks in EUG 4 are subject to this requirement. The 400-bbl fixed roof truck tanks in EUG 4 were observed in compliance evaluations to be equipped with submerged fill piping and are bottom-filled. The tanks subject to NSPS Subpart Kb are exempt from Subchapter 37.
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity greater than 40,000 gallons to be equipped with a floating roof or a vapor-recovery system capable of collecting 85% or more of the uncontrolled VOCs. All of the tanks, except for the 400-bbl tanks in EUG 4, are subject to 40 CFR Part 60, Subpart Kb; therefore, they are exempt from this part.
Part 5 limits the VOC content of coatings. This facility does not conduct coating or painting operations except for routine maintenance of the facility and equipment. Any painting operation will involve maintenance coatings of buildings and equipment and emit less than 100 pounds per day of VOCs and is exempt.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under

the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	not in area category

SECTION VIII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable to This Renewal]

Any future increases of emissions must be evaluated for PSD if they exceed a significance level (100 TPY CO, 40 TPY NOx, 40 TPY SO_2, 40 TPY VOC, 25 TPY PM, 15 TPY PM_{10}, 0.6 TPY Lead).

NSPS, 40 CFR Part 60 [Subparts Kb and JJJJ Applicable]

Subpart Kb, Volatile Organic Liquid (VOL) Storage Vessels. This subpart applies to volatile organic liquids storage vessels (including petroleum liquids storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984, and which have a capacity of 19,813 gallons (75 cubic meters) or more. 40 CFR §60.112b specifies that vessels with a design capacity greater than or equal to 39,980 gallons containing a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 0.75 psia but less than 11 psia shall have one of the following vapor control devices: an external fixed roof in combination with an internal floating roof; an external floating roof; a closed vent system to a control device (flare, condenser, or absorber); or an equivalent system.

All of the tanks, except the 400-bbl tanks in EUG 4, are subject to this subpart and should meet either the internal or external floating roof requirements in §60.112b. The permittee should also comply with testing requirements defined in §60.113b, the reporting and recordkeeping requirements defined in §60.115b, and the monitoring requirements defined in §60.116b of this subpart. In addition, the facility shall comply with all the applicable requirements 40 CFR Part 60 Subpart A including the notifications as described in §60.7.

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry (SOCMI). The equipment is not in a SOCMI plant.
Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size.
Emergency generators 6-1 through 6-4 are propane-fired emergency generators manufactured after the June 12, 2006 and are subject to requirements of this subpart for stationary emergency generator engines. Previous applications indicated the generator were certified by the manufacture.
Subpart OOOO, Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015. This subpart affects natural gas wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, onshore natural gas processing plants, and onshore natural gas sweetening units that commence construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015. The storage vessels are subject to NSPS Subpart Kb and are therefore exempt from NSPS Subpart OOOO. The 400-bbl tanks in EUG 4 were constructed prior to August 23, 2011, and are not subject to NSPS Subpart OOOO.
Subpart OOOOa, Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September 18, 2015. This subpart applies to hydraulically fractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers and pumps, natural gas processing plants, storage vessels, equipment leaks, and natural gas sweetening units that commence construction, modification, or reconstruction after September 18, 2015. All equipment that commenced construction after this date including the storage vessels and equipment leaks at this facility are potentially subject. The storage vessels are subject to NSPS Subpart Kb and therefore exempt from NSPS Subpart OOOOa. The 400-bbl tanks in EUG 4 were constructed prior to September 18, 2015, and are not subject to NSPS Subpart OOOOa.

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the regulated pollutants: arsenic, asbestos, benzene, beryllium, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only affects process streams which contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63 [Subpart ZZZZ Applicable]
Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), only applies to gasoline storage facilities which are major sources of HAPs (10 tons/year for a single HAP, 25 tons/year combined). This facility does not store gasoline and is not a major source of HAPs.
Subpart EEEE, Organic Liquids Distribution (Non-Gasoline). This subpart affects organic liquid distribution (OLD) operations at major sources of HAP emissions. Based on emission calculations this facility is not a major source of HAPs.
Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE that are located at area and major sources of HAP emissions. Owners and operators of new and reconstructed stationary SI-ICE engines at area sources of HAP emissions are required to meet the requirements of 40 CFR Part 60, Subpart IIII or JJJJ as appropriate. All four emergency generators are subject to this subpart and will comply with this subpart by complying with NSPS Subpart JJJJ.

Compliance Assurance Monitoring, 40 CFR Part 64 [Not Applicable]
Compliance Assurance Monitoring applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than the major source thresholds

There are no active control devices on the tanks; therefore, the regulation does not apply.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any substance or any other extremely hazardous substance under the provisions of this part. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. More information on this federal program is available on the web page: *www.epa.gov/rmp*.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).
Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.
Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The standard conditions of the permit address the requirements specified at § 82.156 for persons opening appliances for maintenance, service, repair, or disposal; § 82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; § 82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; § 82.166 for recordkeeping; § 82.158 for leak repair requirements; and § 82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION VIII. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
Full Inspection	06/26/2015	In compliance
Full Inspection	02/09/2017	In compliance
Full Inspection	02/25/2019	In compliance

Enforcement ID 9520 was referred on April 16, 2019 and has not yet been resolved.

SECTION IX. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit. Part 70 operating permit renewal fee of $7,500 has been received.

The applicant published the "Notice of Filing a Tier II Application" in the Stillwater News Press, a local newspaper in Payne County on May 7, 2020. The notice stated that the application was available for review at the Cushing Public Library in Payne County, and also at the Air Quality Division's main office in Oklahoma City. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at https://www.deq.ok.gov.

The applicant requested and was granted concurrent public and EPA review periods. The applicant will publish a "Notice of Draft Tier II Permit" in a local newspaper for a 30 day public review period. The notice of draft permit will state that the draft permit will be available for public review at a location in the county where the facility is located. The draft permit will also be available on the Air Quality section of the DEQ web page at https://www.deq.ok.gov during the 30 day public review period. The proposed permit will be sent to EPA for a 45-day review period.

This facility is not located within 50 miles of the border of Oklahoma so no notice to other states is required.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

SECTION XI. SUMMARY

The facility was constructed as described in the permit application and supplemental materials. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility that would prevent the issuance of this permit. Issuance of the permit is recommended, contingent on public and EPA reviews.

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Rose Rock Midstream, LP **Permit No. 2020-0213-TVR2**
Cushing North Tank Farm

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on April 29, 2020. The Evaluation Memorandum dated July 15, 2021, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Point of emission and emission limitations: [OAC 252:100-8-6(a)(1)]

EUG 2 - Fugitives

EU ID	Point ID	Source	# Items
F1	F1	Pump Seals – light oil	10
F2	F2	Valves – light oil	297
F3	F3	Flanges – light oil	964
F4	F4	Other	168
F5	F5	Loading Boxes	6

EUG 3 - Storage Tanks

EU ID#	Point ID#	Roof Type	Capacity (bbl.)
T-1007	1007	EFR	100,000
T-1009	1009	EFR	100,000
T-1010	1010	EFR	100,000
T-1011	1011	EFR	100,000
T-1012	1012	EFR	100,000
T-2522	2522	EFR	250,000
T-2523	2523	EFR	250,000
T-2524	2524	EFR	250,000
T-2525	2525	EFR	250,000
T-2526	2526	EFR	250,000
T-2527	2527	EFR	250,000
T-2528	2528	EFR	250,000
T-2529	2529	EFR	250,000
T-2530	2530	EFR	250,000
T-2531	2531	EFR	250,000
T-2532	2532	EFR	250,000
T-2533	2533	EFR	250,000
T-2534	2534	EFR	250,000

EU ID#	Point ID#	Roof Type	Capacity (bbl.)
T-2535	2535	EFR	250,000
T-2536	2536	EFR	250,000
T-2537	2537	EFR	250,000
T-2538	2538	EFR	250,000
T-2539	2539	EFR	250,000
T-2540	2540	EFR	250,000
T-2541	2541	EFR	250,000
T-3501	3501	EFR	350,000
T-3502	3502	EFR	350,000
T-3503	3503	EFR	350,000
T-3504	3504	EFR	350,000
T-3505	3505	EFR	350,000
T-3506	3506	EFR	350,000

a) Total VOC emissions from the tanks in this EUG shall not exceed 99.65 TPY VOC, 12-month rolling total, excluding roof landing emissions.

b) Emissions from each tank shall be calculated each month based on the TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20). Compliance with the cap shall be determined on a monthly, 12-month rolling total basis.

c) All above tanks are subject to federal New Source Performance Standards (NSPS), 40 CFR Part 60 Subpart Kb, and shall comply with all applicable standards including but not limited to the following requirements: [40 CFR Part 60, Subpart Kb]

i. External floating roof standards:

1) The external floating roof shall be floating on the liquid surface at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(2)(iii)]

2) Each opening in the external floating roof except for rim space vents and automatic bleeder vents shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the floating roof is to be maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. [§60.112b(a)(2)(ii)]

3) Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or landed on the roof leg supports. [§60.112b(a)(2)(ii)]

4) Rim space vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting or when the external floating roof is not floating. [§60.112b(a)(2)(ii)]

5) Automatic bleeder vents and rim space vents are to be gasketed. [§60.112b(a)(2)(ii)]

6) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. [§60.112b(a)(2)(ii)]

7) Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal. The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in §60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall. The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in §60.113b(b)(4). [§60.112b(a)(2)(i)]

8) The primary seals shall be checked every 5 years. The secondary seal on an external floating roof shall be checked at least yearly for gaps. The secondary seal gap area to tank circumference ratio shall not exceed 1 square inch per foot of tank diameter nor shall any gap exceed 0.5 inches. The primary seal gap area to tank circumference ratio shall not exceed 10 square inch per foot of tank diameter nor shall any gap exceed 1.5 inches. [§60.113b(b)(1), (b)(4)(i), & (b)(4)(ii)(B)]

9) Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed in §60.113b (b)(4)(i) and (ii). [§60.113b(b)(4)]

ii. Standards for all floating roof tanks:

1) The owner or operator shall visually inspect the floating roof, the primary seal, the secondary seal (if present), gaskets, slotted membranes (if present), and sleeve seals (if present) each time the storage vessel is emptied and degassed. If the floating roof has defects, the primary seal has holes, tears, or other openings in the seal or seal fabric; or the secondary seal has holes, tears, or other openings in the seal or seal fabric; or the gaskets no longer close off the liquid surface from the atmosphere; or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exists before refilling the storage vessel with volatile organic liquid (VOL). [§60.113b(b)(6)]

2) The owner or operator shall notify Air Quality in writing at least 30 days prior to filling or refilling of this storage vessel for which inspection is required by 40 CFR §60.113b(6) or prior to any gap measurements required by 40 CFR §60.113b(b)(1) to afford Air Quality an opportunity to have an observer present. If the inspection is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify Air Quality at least seven days prior to refilling the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent so that it is received by Air Quality at least seven days prior to refilling. [§60.113b(b)(6)& (b)(5)]

3) The owner or operator of these storage vessels shall keep records and furnish reports as required by 40 CFR §60.115b. Copies of these reports and records shall be kept for at least two years following the date on which they were made.

EUG 4 – Storage Tanks – Cone Roof

EU ID	Point ID	Roof Type	Capacity (bbl.)	VOC Emissions, TPY
T-403	403	Cone	400	1.52
T-404	404	Cone	400	1.52

a) Emissions from each tank shall be calculated each month based on the TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20). Compliance with the emission limits shall be determined on a monthly, 12-month rolling total basis.
b) The tanks shall be operated with permanent submerged fill pipes.

EUG 4A – New Truck Loading Tanks

EU ID	Point ID	Roof Type	Capacity (bbl.)	VOC Emissions, TPY
T-101	101	IFR	1,000	1.78
T-102	102	IFR	1,000	1.78

a) Emissions from each tank shall be calculated each month based on the TVP of the liquid stored, liquid throughputs, and Section 7.1 of AP-42 (06/20). Compliance with the emission limits shall be determined on a monthly, 12-month rolling total basis.
b) All above tanks are subject to 40 CFR Part 60 NSPS Subpart Kb, and shall comply with all applicable standards including but not limited to the following requirements:

[40 CFR Part 60, Subpart Kb]

i. Internal floating roof standards:
1) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) at all times except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(1)(i)]
2) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position (i.e., no visible gaps) except when in actual use. The cover or lid shall be equipped with a gasket. Covers on the access hatch and each automatic gauge float well shall be bolted except when in use. [§60.112b(a)(1)(iv)]
3) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or landed on the roof leg supports. [§60.112b(a)(1)(v)]

4) Rim space vents shall be equipped with a gasket and are to be set to open only at the manufacturer's recommended setting or when the internal floating roof is not floating. [§60.112b(a)(1)(vi)]
5) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [§60.112b(a)(1)(ii)]
   (A) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal).
   (B) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof.
   (C) A mechanical shoe seal.
6) Each penetration of the internal floating roof that allows for passage of a column or ladder shall have a flexible fabric sleeve seal or a gasketed sliding cover. [§60.112b(a)(1)(ii)]
7) Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. [§60.113b(a)(2)]

ii. Standards for all floating roof tanks:
1) The owner or operator shall visually inspect the floating roof, the primary seal, the secondary seal (if present), gaskets, slotted membranes (if present), and sleeve seals (if present) each time the storage vessel is emptied and degassed. If the floating roof has defects, the primary seal has holes, tears, or other openings in the seal or seal fabric; or the secondary seal has holes, tears, or other openings in the seal or seal fabric; or the gaskets no longer close off the liquid surface from the atmosphere; or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exists before refilling the storage vessel with volatile organic liquid (VOL). [§60.113b(a)(4)]
2) The owner or operator shall notify Air Quality in writing at least 30 days prior to filling or refilling of this storage vessel for which inspection is required by 40 CFR §60.113b to afford Air Quality an opportunity to have an observer present. If the inspection is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify Air Quality at least seven days prior to refilling the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent so that it is received by Air Quality at least seven days prior to refilling. [§60.113b(a)(5)]

3) The owner or operator of these storage vessels shall keep records and furnish reports as required by 40 CFR §60.115b. Copies of these reports and records shall be kept for at least two years following the date on which they were made.

EUG 5 - Roof Landings

EU ID	Tank Size (bbl)	Number of Tanks	Events Per Year
EUG-3 tanks	100K	5	2
EUG-3 tanks	250K	20	13
EUG-3 tanks	350K	6	2
EUG-4A tanks	1K	2	1

a) This facility is limited to a cap of 44.5 TPY of VOC for all roof landing events based on a monthly, 12-month rolling total basis.
b) Records shall be kept of the number of landings per year for each tank size.
c) Landing emissions shall be calculated and compliance with the cap determined each month.

EUG 6 - Emergency Generators

EU	Make/Model	HP	Fuel
6-1	Generac 7042	30	Propane
6-2	Generac 7042	30	
6-3	Generac 7042	30	
6-4	Generac 7042	30	

The emergency generators are limited to EPA Tier 3, nonroad requirements.

2. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]

3. The facility may handle “sweet” or “sour” crude with a blended sulfur content of 5% or less in any external floating roof tank. The crude oil in each tank shall be classified as “sweet” or “sour” based on sulfur content, and records of classification and sulfur content shall be kept each month for each tank of crude oil classification and sulfur content. [OAC 252:100-31]

4. Each piece of equipment to which these specific conditions apply shall have a permanent means of identification which distinguishes it from other equipment. [OAC 252:100-8-5 (e)(3)(B)]

5. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart JJJJ, for all stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction, modification, or reconstruction after June 12, 2006, including, but not limited to, the following. [40 CFR §§ 60.4230 to 60.4248]

a) §60.4230 Am I subject to this subpart?
b) The emission standards of §60.4233 and §60.4234.
c) The fuel requirements of §60.4235.

d) The deadlines for importing or installing SI ICE produced in the previous model year in accordance with §60.4236.
e) The monitoring requirements of §60.4237.
f) The compliance requirements of §60.4243.
g) The performance test methods and other procedures of §60.4244.
h) The notification, reporting, and recordkeeping requirements of §60.4245.
i) §60.4246 What parts of the General Provisions apply to me?
j) §60.4248 What definitions apply to this subpart?

6. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart ZZZZ, for any existing, new, or reconstructed reciprocating internal combustion engines (RICE) including, but not limited to, the following. [40 CFR §§ 63.6580 to 63.6675]

a) § 63.6580 What is the purpose of subpart ZZZZ?
b) § 63.6585 Am I subject to this subpart?
c) § 63.6590 What parts of my plant does this subpart cover?
d) § 63.6595 When do I have to comply with this subpart?
e) § 63.6600 What emission limitations and operating limitations must I meet?
f) § 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
g) § 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
h) § 63.6605 What are my general requirements for complying with this subpart?
i) § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake horsepower located at a major source of HAP emissions?
j) § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake horsepower located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
k) § 63.6615 When must I conduct subsequent performance tests?
l) § 63.6620 What performance tests and other procedures must I use?
m) § 63.6625 What are my monitoring, installation, collection operation, and maintenance requirements?
n) § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations and other requirements?
o) § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
p) § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations and other requirements?
q) § 63.6645 What notifications must I submit and when?
r) § 63.6650 What reports must I submit and when?
s) § 63.6655 What records must I keep?
t) § 63.6660 In what form and how long must I keep my records?
u) § 63.6665 What parts of the General Provisions apply to me?
v) § 63.6670 Who implements and enforces this subpart?

w) § 63.6675 What definitions apply to this subpart?

7. The permittee shall maintain records of operations as listed below. These records shall be retained onsite for at least five years from the date of recording, inspection, testing, or repair, and shall be made available to regulatory representatives upon request.
[OAC 252:100-8-6 (a)(3)(B)]

   a) Throughput records for each tank in Specific Condition No. 1 (monthly and 12-month rolling totals calculated no later than 30 days after the end of each 12-month period.) Throughput shall be derived from flow measurement.
   b) Records of liquid TVP and of emissions calculations demonstrating compliance with the permitted emission limits in Specific Condition No.1 (monthly and 12-month rolling total).
   c) Records of crude oil classification ("sour" or "sweet") and sulfur content of crude oil in each tank (monthly).
   d) A record of all roof landing events, including calculations of emissions (in TPY, monthly and 12-month rolling total).
   e) Records required by NSPS Subparts Kb and JJJJ.
   f) Records required by NESHAP Subpart ZZZZ.
   g) Annual hours of operation for each emergency generator.

8. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility. [OAC 252:100-8-6(d)(2)]

   a) OAC 252:100-7 Permits for Minor Facilities
   b) OAC 252:100-11 Alternative Emissions Reduction
   c) OAC 252:100-15 Mobile Sources
   d) OAC 252:100-39 Nonattainment Areas

9. This permit supersedes and replaces all previous Air Quality operating permits for this facility, which are now canceled.

10. No later than 30 days after each anniversary date of the issuance of the initial TV permit (October 19, 2001, the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6(c)(5)(A) & (D)]

11. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]

PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON STREET, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2020-0213-TVR2

Rose Rock Midstream, LP

having complied with the requirements of the law, is hereby granted permission to operate the Cushing North Tank Farm at Section 22, Township 18N, Range 5E, Payne County, Oklahoma subject to standard conditions dated June 21, 2016, and specific conditions, both attached.

This permit shall expire five (5) years from the date of issuance, except as authorized under Section VIII of the Standard Conditions.

DRAFT/PROPOSED

Division Director
Air Quality Division

Date

MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.
[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other

information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM_{10}). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit. [OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment. [OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
(3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
(4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or

condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

(2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]

(a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
(b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
(c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
(d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).
(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
(6) The DEQ complies with 40 C.F.R. § 70.8(d).
(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Rose Rock Midstream LP
Attn. Mr. David Hennessy
81111 Westchester Drive, Suite 600
Dallas, TX 75225

SUBJECT: Part 70 Operating Permit Renewal No. **2020-0213-TVR2**
Cushing North Tank Farm
AQD Facility ID: 7238
Section 22, Township 18N, Range 5E, Payne County, OK

Dear Mr. Hennessy:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish.

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed);

2. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;

3. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures

NOTICE OF DRAFT PERMIT
TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

SAMPLE NOTICE *(Italicized print is to be filled in by the applicant.)***:**

DEQ NOTICE OF TIER *...II ...* **DRAFT PERMIT**

A Tier *...II...* **application for an air quality** *...type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)...* **has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant,** *...name and address.*

The applicant requests approval to *...brief description of purpose of application...* **at the** *...site/facility name ... ...***[proposed to be] located at** *...physical address (if any), driving directions, and legal description including county....*

In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: *...xx-xxx-x...***), which may be reviewed at** *...locations (one must be in the county where the site/facility is located)...* **or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: http://www.deq.ok.gov/**

This draft permit would authorize the facility to emit the following regulated pollutants: *(list each pollutant and amounts in tons per year (TPY))*

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: **Only those issues relevant to the proposed modification(s) are open for comment.**] **A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.**

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [For Construction Permits, add: **The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.**]

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: http://www.deq.ok.gov/.

For additional information, contact *...names, addresses and telephone numbers of contact persons for the applicant,* **or contact DEQ at: Chief Engineer, Permits & Engineering Group, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
4-15-21

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CCR	Continuous Catalyst Regeneration
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COA	Capable of Accommodating
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DG	Demand Growth
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FCCU	Fluid Catalytic Cracking Unit
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
H_2CO	Formaldehyde
H_2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HFR	Horizontal Fixed Roof
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
ICE	Internal Combustion Engine
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NMHC	Non-methane Hydrocarbon
NGL	Natural Gas Liquids
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review

O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
PAH	Polycyclic Aromatic Hydrocarbons
PAE	Projected Actual Emissions
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RFG	Refinery Fuel Gas
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
SRU	Sulfur Recovery Unit
T	Tons
TAC	Toxic Air Contaminant
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VFR	Vertical Fixed Roof
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn